

## Enclosure B

COUNTY RESPONSE COVER PAGE  
MUST BE FULLY COMPLETED AND SUBMITTED WITH PLAN AND DATA

**Plumas** County is requesting participation in the IHSS Fraud Prevention Program and will submit a Plan and data as described above, by September 1, 2010.

### **Board of Supervisors Approval**

Approved on **Sept. 14, 2010**, by the County Board of Supervisors

Name of Approver: **Sharon Thrall**

Title: **Chair, Board of Supervisors**

Signature\_\_\_\_\_

### **Board of Supervisors**

Name of Representative: **Sharon Thrall**

Title: **Chair, Board of Supervisors**

Telephone #: \_\_\_\_\_

Email Address: \_\_\_\_\_

### **County Welfare Department**

Name of Representative: **Elliott Smart**

Title: **Social Services Director**

Telephone #: **530-283-6350**

Email Address: [elliottsmart@countyofplumas.com](mailto:elliottsmart@countyofplumas.com)

### **County District Attorney Office**

Name of Representative: **Jeff Cunan**

Title: **District Attorney**

Telephone #: **530-283-6330**

Email Address: [jeffcunan@countyofplumas.com](mailto:jeffcunan@countyofplumas.com)

## Enclosure C

### County Plan Components

#### County Current and Proposed Anti-Fraud Activities

Nearly all current fraud referrals in the IHSS program are received from PCDSS staff. Occasional referrals come from community-based sources. Random reviews by County QA and supervisory staff operate to enhance our anti-fraud efforts. These three sources are the primary mechanisms for referrals.

Consistent with our prior plan, the Department has begun utilizing certain case criteria that operate to trigger case reviews and investigative activities by our SIU. The SIU provides monthly updates to management and supervisory staff regarding the status of IHSS investigations. The Department's plan is to have written guidelines available for fraud reporting although we have not completed this project as of this writing.

All new providers are furnished with a County-produced IHSS handbook. Within the handbook, the County provides the following information:

*"Sometimes providers will claim hours worked while they were hospitalized, on vacation or otherwise unable to work the hours claimed for a particular day. **This is Fraud.** If IHSS discovers that a provider is claiming hours worked when they did not work, that provider will not be paid for those hours...IHSS also has the option to terminate the provider's employment and/or refer that provider to the agency fraud investigator".*

Provider orientation is currently conducted under contract with the Nevada-Sierra Public Authority. Within the elements of this orientation, extensive information is provided to IP's regarding the elements that constitute fraud and how fraud can be avoided.

Anti-fraud activities that have been considered include unannounced visits to the homes of consumers. This element of our plan has not been put into place due to significant concerns raised by members of the senior community. Seniors have raised legitimate and appropriate concerns about strangers making unannounced house calls. Seniors are typically advised not to allow such visitation for their own safety. Recommendations to the state to establish a system to verify the identity of DHCS investigators have not been responded to. (Please see enclosed letter from the Plumas County Board of Supervisors to CDSS).

The County plans to fully cooperate with DHCS investigators when such personnel are deployed to Plumas County, however in the absence of a system to verify the identity of such individuals, we will not support unilateral unannounced home visits from such personnel.

The county supervisory and management staff will continue to track errors in program administration and to the extent that it is necessary and appropriate, partner with CDSS on such studies.

### **County Proposed Budget for the Utilization of Funds**

1. Personnel Costs ----- \$9,517

Justification: Salary and benefit costs for .10 FTE Welfare Fraud Investigator who will be assigned to IHSS Investigations.

2. Operating Costs----- \$1,000

Justification: Postage and Office Supplies

3. Professional Services----- \$14,797

Justification: Funding for an MOU with the Nevada Sierra Public Authority for assistance with provider orientation and anti fraud activities.

4. Special Travel ----- \$1,000

Justification: Travel for training

Total----- \$26,314

### **Collaboration with the District Attorney**

The Department of Social Services has had a long-standing partnership with the District Attorney. The Department is enhancing this long-standing collaboration by making referrals to the DA when our investigation determines that a potential crime has been committed. Under certain sets of facts, the Department may conduct joint investigations with the DA when the circumstances dictate it. We have enhanced communication through our Special Investigations Unit so that the Department can meet the DA's needs for facts and evidence that support prosecutions.

All substantiated IHSS fraud investigations where the estimated value of the fraud is \$500 or less will be referred to the Office of the District Attorney for

their evaluation and a determination regarding whether criminal fraud prosecution will be pursued. The District Attorney reviews allegations and determines whether to proceed with prosecution.

These enhanced partnerships will result in reduced incidences of IHSS fraud particularly as publication of arrests and convictions for IHSS fraud occurs.

### **Fraud Referrals/Outcomes**

The Department tracks all IHSS fraud referrals and their outcomes. Data is available to report to the State Department of Social Services pursuant to their needs and requirements. The primary point of referral in the Department is the Welfare Fraud Investigator. She will in turn make decisions about the appropriate routing of referrals to either CDSS or the District Attorney.

### **Identification of IHSS Overpayments and Underpayments**

County quality assurance (QA) activities are performed by a Senior Social Worker that is assigned .50 FTE to performing QA activities. The IHSS QA Senior Social Worker plays a key role in identifying overpayments and underpayments. Key elements of this role include random review of cases and reviews of cases that exceed the 300 hour threshold. Other elements generating case reviews for overpayments and underpayments could include reports from the public and/or other sources.

When the QA Senior Social Worker determines that approved IHSS supportive services authorized by the case carrying social worker are suspected of not being performed by providers or that other elements of potential fraud are suspected to exist which could lead to an overpayment, the IHSS QA Senior Social Worker shall refer the case to the assigned IHSS case carrying social worker. The case carrying social worker shall review submitted time cards for determination regarding whether a suspected fraud referral is to be made.

Upon review of such cases where there is suspicion that authorized services are not being provided and where time cards have been submitted and paid, for all authorized hours, the case carrying social worker refers the suspected fraud case to the Welfare Fraud Investigator (Special Investigations Unit – SIU) for further investigation.

As appropriate, overpayment cases may be referred to the District Attorney for further review and potential prosecution for alleged crimes such as forgery or perjury.

To the extent that review of apparent underpayments suggests that they may have derived from consumer error, misreporting of hours or social worker

error, such cases are referred to the case carrying social worker for correction. Social workers will be responsible for keeping IHSS recipients apprised of proper reporting of hours and the consequences for incorrect reporting.

### **Collaboration with the Department of Health Care Services and the Department of Social Services**

Although currently, DHCS investigators do not make visits to Plumas County, the Department is prepared to fully collaborate and cooperate with DHCS staff. Internal SIU staff will be available to DHCS for collaborative and joint investigative activities as needed and appropriate.

In addition, all initial referrals for investigation of suspected IHSS fraud will be evaluated for suitability of referral to the State Department of Health Care Services or the State Department of Social Services. Where the suspected dollar value exceeds \$500, an automatic referral will be made.

### **Mechanism for Tracking/Reporting**

The County will track all referrals and will report outcomes and other data as proscribed by CDSS. Tracking of referrals and outcomes will take place in the County Special Investigations Unit (SIU). We agree to continue to track such referrals and outcomes and make such reports as are requested or required by CDSS regarding this data.

Enclosure D

County: Plumas

Overpayments identified by County QA		04/05	05/06	06/07	07/08	08/09	09/10
Total Amount per Fiscal Year:		\$ 782	Unk	Unk	Unk	Unk	\$8,062
Number of Instances:		2	3	3	2	1	8
Breakdown of Causes	Provider:	2	3	3	2	0	1
	Recipient:	0	0	0	0	1	7
	County Error:	0	0	0	0	0	0
	Unknown:	0	0	0	0	0	0
	Other:	0	0	0	0	0	0

Underpayments identified by County QA		04/05	05/06	06/07	07/08	08/09	09/10
Total Amount per Fiscal Year:		0	0	0	0	0	0
Number of Instances:							
Breakdown of Causes	Provider:						
	Recipient:						
	County Error:						
	Unknown:						
	Other:						

Fraud Referrals/Outcomes		04/05	05/06	06/07	07/08	08/09	09/10
Number of referrals to DHCS:		0	0	0	0	0	1
Number handled locally:		1	0	0	1	0	7
Number of convictions:		1	0	0	0	0	0
Amount of funds involved in the convictions:		782					\$8,062

**Enclosure D**  
**Page Two**

<b>Fraud Referrals/Outcomes</b>		<b>04/05</b>	<b>05/06</b>	<b>06/07</b>	<b>07/08</b>	<b>08/09</b>	<b>09/10</b>
Amount of funds recovered:		<b>782</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Amount of funds pending recovery:							<b>\$8,062</b>
Basis for the Conviction:							
<b>Individuals Responsible</b>	Recipient:					<b>1</b>	
	Provider:	<b>2</b>	<b>3</b>	<b>3</b>	<b>1</b>		
	County Staff:		<b>1</b>				
	Other:						
	Unknown:						

<b>Utilization of County DA for Fraud</b>		<b>04/05</b>	<b>05/06</b>	<b>06/07</b>	<b>07/08</b>	<b>08/09</b>	<b>09/10</b>
Number of referrals to DA		<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>Outcomes</b>	Rejected:						
	Convicted:	<b>1</b>					
	Acquitted:						
	Pending:						<b>1</b>

# Budget Justification

## Plumas County's Fraud Funding Plan for FY 2010-11

Budget Section	Total
A. Personnel Costs (includes employee benefits)	\$ 9,517
B. Operating Expenses	\$ 1,000
C. Equipment Expenses	\$ 0
D. Travel/Per Diem and Training	\$ 1,000
E. Subcontracts and Consultants	\$ 14,797
F. Other Costs	\$ 0
G. Indirect Expenses	\$ 0
<b>Total Expenses</b>	<b>\$ 26,314</b>

A. Personnel Costs (including employee benefits)	Total Budget
<b>Title:</b> Welfare Fraud Investigator  <b>Salary Calculation:</b> \$95,170 Salary and Benefits @ .10 FTE assigned to IHSS Fraud Investigations  <b>Duties Description:</b> The Welfare Fraud investigator conducts initial investigations of allegations of provider or recipient fraud in the IHSS program. Based upon initial findings, the Investigator may refer the case to the Plumas County District Attorney for either additional investigation or a joint investigation and/or may also refer the investigation to the DHCS for either additional or joint investigation.	\$ 9,517
<b>Title:</b>  <b>Salary Calculation:</b>  <b>Duties Description:</b>	\$
<b>Title:</b>  <b>Salary Calculation:</b>  <b>Duties Description:</b>	\$
<b>Title:</b>  <b>Salary Calculation:</b>  <b>Duties Description:</b>	\$
<b>Title:</b>	\$



Salary Calculation:	
Duties Description:	
Title:	\$
Salary Calculation:	
Duties Description:	
<b>Total Personnel Costs:</b>	<b>\$ 9,517</b>

<b>B. Operating Expenses</b>	<b>Total Budget</b>
Title: Postage	\$ 300
Description: Mailing anti-fraud and other program integrity information to potential providers and to new IHSS recipients	
Title: Office Supplies	\$ 700
Description: Paper, envelopes, etc	
Title:	\$
Description:	
<b>Total Operating Expenses:</b>	<b>\$ 1,000</b>

<b>C. Equipment Expenses</b>	<b>Total Budget</b>
Title: None	\$ 0
Description:	
Title:	\$
Description:	
Title:	\$
Description:	
<b>Total Equipment Expenses:</b>	<b>\$ 0</b>

<b>D. Travel/Per Diem and Training</b>	<b>Total Budget</b>
<b>Title: Special Travel</b>  <b>Description: Travel for training and to conduct home visits and field investigations</b>	\$ 1,000
<b>Title:</b>  <b>Description:</b>	\$
<b>Title:</b>  <b>Description:</b>	\$
<b>Total Travel/Per Diem and Training:</b>	<b>\$</b>

<b>E. Subcontracts and Consultants</b>	<b>Total Budget</b>
<b>Title: Professional Services</b>  <b>Description: Memorandum of Understanding with the Plumas County District Attorney for the purposes of conducting joint investigations into suspected IHSS fraud. Agreement with the Nevada Sierra Public Authority to conduct background checks, finger imaging and provider orientation.</b>	\$ 14,797
<b>Title:</b>  <b>Description:</b>	\$
<b>Title:</b>  <b>Description:</b>	\$
<b>Total Subcontracts and Consultants:</b>	<b>\$ 14,797</b>

<b>F. Other Costs</b>	<b>Total Budget</b>
<b>Title:</b>  <b>Description:</b>	\$ 0
<b>Title:</b>  <b>Description:</b>	\$
<b>Title:</b>	<b>\$</b>

<b>Description:</b>	
<b>Title:</b>	\$
<b>Description:</b>	
<b>Title:</b>	\$
<b>Description:</b>	
<b>Total Other Costs:</b>	<b>\$ 0</b>

<b>G. Indirect Expenses</b>	<b>Total Budget</b>
<b>Title:</b>	\$ 0
<b>Description:</b>	
<b>Title:</b>	\$ 0
<b>Description:</b>	
<b>Total Other Costs:</b>	<b>\$ 0</b>